

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
LITTLE ROCK DIVISION**

ROBERT DAVIS

PLAINTIFF

v.

CASE NO.: CV-07-00521

UNION PACIFIC RAILROAD COMPANY

DEFENDANT

**PLAINTIFF'S SUPPLEMENTAL RESPONSES
TO DEFENDANT'S REQUEST FOR PRODUCTION**

COMES NOW Plaintiff, Robert Davis, by and through counsel, and for his Supplemental Responses to Defendant's Request for Production states as follows:

REQUEST FOR PRODUCTION NO. 13: Any and all records, documents, depositions, statements or other documentation regarding any personal injury claim or lawsuit to which Plaintiff has been a party, either prior to or subsequent to, the incident alleged in the Complaint. This specifically excludes the present lawsuit.

RESPONSE: Objection. Overly broad.

SUPPLEMENTAL RESPONSE: Objection: overly broad and seeks privileged materials as to items requested. Subject to and without waiving said objection, Plaintiff states he had prior claims for carpal tunnel (handled directly with UPRR Claims Department) and currently for asbestos with the Peirce law firm. This information is available to Defendant. Plaintiff objects to the extent that RFP seeks communications about the asbestos claim that are protected by the attorney-client privilege.

REQUEST FOR PRODUCTION NO. 21: Any and all photographs, movies or videotapes of the scene of the alleged occurrence which depict the scene and/or equipment in the condition it was in at the time of or after the time of the occurrence alleged in Plaintiff's Complaint.

RESPONSE: Objection: work product.

Respectfully submitted,


SCHLICHTER, BOGARD & DENTON

NELSON G. WOLFF Fed #37998; Ark #2006002
100 South Fourth Street, Suite 900
St. Louis, Missouri 63102
(314) 621-6115
(314) 621-7151 (fax)

ATTORNEYS FOR PLAINTIFF

Edward T. Oglesby ABN 89158
Suite 110 Morgan Keegan Bldg.
100 Morgan Keegan Dr.
Little Rock, AR 72202
(501) 664-1000 Fax (501) 644-1012
edward@oglesbylaw.com

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of April, 2008 a true and correct copy of the above was delivered by fax and United States First Class mail with postage prepaid to the following: Scott H. Tucker, Friday, Eldredge & Clark 400 W. Capitol Avenue, Ste 2000 Little Rock, AR 72201

































